

Exhibit L

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October 25, 2022

VIA EMAIL

Edward P. Sullivan, Esq., Special Assistant U.S. Attorney
Heidi B. Gesch, Esq., Assistant U.S. Attorney
United States Attorney's Office
for the Eastern District of Virginia
Justin W. Williams United States Attorney's Building
2100 Jamieson Avenue
Alexandria, VA 22314

Re: United States v. Julio R. Sotomayor, 1:22-cr-00122-RDA-1

Dear Ed and Heidi:

This letter addresses our initial review of the fourth production of discovery materials and our continued concerns regarding discovery in this matter. We received your October 20 email and letter that responds to our October 10 and 13 letters.

The fourth production contains additional grand jury testimony from Special Agent Erin Pallack given on July 6, 2022. You attached the testimony of Robert Sturgis from May 18, 2022 to your October 20 letter. To date, this is the extent of grand jury testimony relevant to the conduct alleged in the indictment that we have received. We repeat and reiterate our request to provide all remaining grand jury testimony to us as part of your fifth production.

As you noted in your October 18 production letter, the fourth production contained "eight .pst files that have not yet been processed" by your office. It appears that these .pst files are not materials that we have ever requested but are yet another unorganized email data dump of over 98,000 documents from Patricia Thomas's email account. You have provided no other context regarding why your office has produced these unprocessed files or any relevance they might have to the conduct charged in the indictment. Further, the government interview memo documenting the FBI's interaction with Ms. Thomas (FBI-00065668) does not include a substantive summary of the interaction or why Ms. Thomas provided the .pst files. We ask that you provide a substantive summary so that we can properly evaluate whether this data contains any information relevant to the conduct described in the indictment.

Relatedly, our review of the third production found documents that were produced to us in redacted form. These are documents that were reviewed during an interview with Ms. Thomas and include the following bates numbers: FBI-00060794, FBI-00060824, and FBI-00060915. The fourth production includes the following bates range of documents that are, similarly, redacted without explanation: FBI-00065668–FBI-00066220. We request that you immediately reproduce these documents in an unredacted format.

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Finally, we disagree with your refusal to identify materials with exculpatory information and all other known *Brady* materials in the government discovery productions and the assertion that our October 13 letter has mischaracterized the burdensome and unorganized nature of the discovery the government has provided, as well its deficiencies. While your letter describes the discovery involving our client as "fairly discrete," you have withheld critical testimony and documents while producing an extraordinarily voluminous quantity of irrelevant data.

Please let us know when you will be providing the next production of documents as mentioned in your October 20 letter. We will coordinate with Heidi to receive a copy of the unfiltered Web.com materials.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Pease III", with a long horizontal flourish extending to the right.

John J. Pease III

cc: Jonathan York, Esq.